

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

<div>In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> Debtors.¹</div>	<div>PROMESA Title III Case No. 17 BK 3283-LTS (Jointly Administered)</div>
<div>In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of PUERTO RICO ELECTRIC POWER AUTHORITY, Debtor.</div>	<div>PROMESA Title III Case No. 17 BK 4780-LTS Re: ECF Nos. 814 (Case No. 17-4780), 2980 (Case No. 17-3283)</div>
<div>MASTER LINK CORPORATION, Movant, -against- THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of PUERTO RICO ELECTRIC POWER AUTHORITY, Respondent.</div>	<div>Motion in Compliance with Order Relates Only to PREPA and Shall Only be Filed in Case Nos. 17 BK 3283-LTS and 17 BK 4780- LTS</div>

¹ The Debtors in the jointly-administered Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (iv) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

**JOINT MOTION IN COMPLIANCE WITH ORDER RELATED TO
WIDERANGE CORPORATION'S MOTION FOR RELIEF OF STAY**

To the Honorable United States District Court Judge Laura Taylor Swain:

On behalf of the Puerto Rico Electric Power Authority ("PREPA"), the Puerto Rico Fiscal Agency and Financial Advisory Authority ("AAFAF") pursuant to the authority granted to it under the *Enabling Act of the Fiscal Agency and Financial Advisory Authority*, Act 2-2017, and Movant, Widerange Corporation ("WR"), respectfully submit this Joint Motion in Compliance with Order (the "Motion"). In support of the Motion, the parties respectfully state as follows:²

1. On July 16, 2018, this Court issued an order granting WR's unopposed request for an extension of time to file a joint report and extended the deadline to July 25, 2018. [Dkt. No. 3525.] The joint report pertains to this Court's order entered on May 1, 2018 (the "Initial Order") concerning the parties' "efforts to seek to develop a mutually acceptable resolution of the outstanding performance bond issue or, at minimum, an agreed statement regarding the nature and pendency of the stayed litigation that can be used in connection with inquiries as WR's bids for business." [Dkt. No. 2980 at 6.]

2. In compliance with the Initial Order, the parties hereby inform the Court of the efforts made by both parties to reach an agreement as related to the nature and pendency of the stayed litigation and WR's concerns regarding the potential impact of the pending litigation in relation to its commercial prospects with PREPA.

3. Counsel for each of the parties met on July 12, 2018. After the meeting, PREPA's counsel provided WR with some documents regarding WR's contracts with

² The Financial Oversight and Management Board for Puerto Rico, as the Debtors' representative pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* ("PROMESA"), has authorized AAFAF to join in this Motion on behalf of PREPA.

PREPA and both parties are currently in the process of drafting a mutually acceptable statement that will address the Court's Initial Order and both parties' concerns going forward.

4. Accordingly, the parties respectfully request that the parties provide the Court a joint status report on these efforts on or before August 27, 2018.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that on this date, I have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record.

In San Juan, Puerto Rico, this 25th of July, 2018.

**THE PUERTO RICO FISCAL
AGENCY AND FINANCIAL
ADVISORY AUTHORITY, as Fiscal
Agent for PREPA**

By its attorneys,

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**THE PUERTO RICO ELECTRIC
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San Juan, Puerto Rico
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